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Attorneys for Defendant Carrier IQ, Inc.

[Additional Defense Counsel Listed Below]

16 UNITED STATES DISTRICT COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19 In re Carrier IQ, Inc. Consumer Privacy
20 Litigation

21 This Document Relates to:
22 ALL CASES

No. 3:12-md-2330-EMC

JOINT CASE MANAGEMENT
CONFERENCE STATEMENT AND
NOTICE OF SETTLEMENT

Date: July 2, 2015
Time: 10:30 a.m.
Place: Courtroom 5, 17th Floor
Judge: Hon. Edward M. Chen

1 Pursuant to Civil Local Rule 16-10(d), plaintiffs' interim co-lead counsel and counsel for
2 defendants Carrier IQ, Inc., HTC America, Inc., HTC Corporation, Huawei Devices USA, Inc., LG
3 Electronics MobileComm U.S.A, Inc., LG Electronics, Inc., Motorola Mobility LLC, Pantech
4 Wireless, Inc., Samsung Telecommunications America, LLC, and Samsung Electronics Co., Ltd.
5 (collectively, "defendants") submit the following Further Joint Case Management Conference
6 Statement in advance of the Further Case Management Conference currently scheduled for July 2,
7 2015.
8

9 **A. SETTLEMENT BETWEEN PLAINTIFFS AND ALL DEFENDANTS**

10 Following the last mediation session on April 27, 2015, the parties reached agreement in
11 principle on a global settlement subject to execution of a written settlement agreement. Plaintiffs
12 recently prepared and distributed a draft settlement agreement to Defendants, which Defendants are
13 reviewing and hope to finalize soon subject to agreement on the last remaining material terms (with
14 the caveat that a notice plan has not yet been concluded, as discussed below).
15

16 The Parties have been working diligently to conclude their efforts as soon as reasonably
17 possible, but unfortunately were unable to conclude their work in time to complete all of the
18 settlement papers, including a notice plan, such that a motion for preliminary approval could be filed
19 within 30 days of the Court's order of May 26, 2016 (Dkt. No. 372), per the terms of that order.
20

21 Regarding notice, Plaintiffs have consulted, and continue to consult, with notice
22 administration firms toward a plan designed to effect the best notice to settlement class members that
23 is practicable under the circumstances. Completion of the notice plan, and any further efforts as to
24 notice that would be appropriate thereafter, is one of the last significant steps requiring completion
25 before the settlement agreement can be finalized. The parties presently anticipate that the settlement
26 agreement and claims administration plans should be finalized in the next 30 days, with the notice
27 plan to be finalized as soon as reasonably possible. The parties request that the court schedule a
28

1 status conference call for July 30, 2015. The parties also respectfully request that the Court stay all
2 deadlines in light of the reported developments. All parties are committed to working expeditiously
3 to complete the settlement and preliminary approval process.

4 Dated: June 25, 2015

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ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)

I, Tyler G. Newby, am the ECF User whose identification and password are being used to file this **FURTHER JOINT CASE MANAGEMENT CONFERENCE STATEMENT AND NOTICE OF SETTLEMENT**. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that all signatories have concurred in this filing.

Dated: June 25, 2015

/s/ Tyler G. Newby
Tyler G. Newby

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CERTIFICATE OF SERVICE

I hereby certify that on June 25, 2015, I electronically filed the foregoing document using the CM/ECF system which will send notification of such filing to the e-mail addresses registered in the CM/ECF system, as denoted on the Electronic Mail Notice List, and I hereby certify that I have caused to be mailed a paper copy of the foregoing document via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice List generated by the CM/ECF system.

Dated: June 25, 2015

/s/ Tyler G. Newby
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